

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NIKKO D'AMBROSIO,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:24-cv-00678
	)	
ABBIGAIL RAJALA,	)	
CAROL RAJALA,	)	<b>JURY TRIAL DEMAND</b>
RODNEY RAJALA,	)	
PAOLA SANCHEZ,	)	
BLAKE MILLBRAND,	)	
META PLATFORMS, INC., a Delaware Corporation,	)	
SPILL THE TEA, INC., a Delaware Corporation,	)	
JANE DOES 1-26, Unnamed Defendants using screen	)	
names: Sam Daniels, Alexis Kyle, Coraline Lotz,	)	
Dianne Wesley, Madison Pierce, Madison Bynum,	)	
Vanessa Villatoro, Christy Graessle, Sharleen Waa,	)	
Kaitlyn Mishay Moody, Linda Juarez, Amber Michelle,	)	
Laura Maddox, Alina Drake, Chandi Constance,	)	
Alicia Ann, Salisha P. Dean, Jillian Cara, Jen Rahbar,	)	
Shannon Marie, Luisa Resendez, Daryl Ceasar, Lisa Miko,	)	
Amy Dukstein-Reynolds, Melissa Pinkerton, Monica Tska,	)	
Defendants.	)	

**PLAINTIFF'S FIRST AMENDED COMPLAINT AT LAW**

Now comes the Plaintiff, Nikko D'Ambrosio, by and through undersigned counsel, and complaining of the Defendants, states as follows:

**NATURE OF THE ACTION**

This is an action for declaratory and injunctive relief and for damages against Defendants for the misappropriation of Plaintiff's intellectual property and likeness under the Illinois Right to Publicity Act (765 ILCS 1075), in addition to the publication of false and defamatory statements made and published by Defendants concerning Plaintiff under the Illinois Slander and Libel Act (740 ILCS 145), to protect Plaintiff's rights to be free from the deliberate unauthorized

dissemination of Plaintiff's personal identifying information under the Illinois Civil Liability for Doxing Act (740 ILCS 195), and common law causes of action

### **PARTIES**

1. The Plaintiff, Nikko D'Ambrosio, is an adult male who is a citizen of Illinois and resides in the territorial jurisdiction of the District Court.

2. The Defendant, Abbigail Rajala, is an adult female who is a citizen of and is domiciled in the State of Michigan. Defendant Abbigail Rajala engaged in the distribution of Plaintiff's intellectual property on or about November 13, 2023, by republishing a photograph which he owns containing his personal likeness on the internet.

3. The Defendant, Carol Rajala, is an adult female who is a citizen of and is domiciled in the State of Michigan.

4. The Defendant, Rodney Rajala, is an adult male who is a citizen of and is domiciled in the State of Michigan.

5. The Defendant, Paola Sanchez, is an adult female who is a citizen of and is domiciled in the State of California. Paola Sanchez is the owner and manager of Spill the Tea, Inc., and operates as the lead administrator of the "Are We Dating the Same Guy?" online communities. Sanchez's responsibilities include the manual review and approval of defamatory statements and republication of others' intellectual property without consent by members of her community. Sanchez maintains a platform with the intent and purpose of enabling the unauthorized redistribution of others' intellectual property without consent. Sanchez has received substantial monetary proceeds in the form of crowdfunding and donations in order to support her illegal enterprise.

6. The Defendant, Blake Millbrand, is a citizen of and domiciled in the State of California and is an owner of Spill The Tea, Inc. Millbrand is upon information and belief the primary software developer for the companies. Millbrand maintains a platform with the intent and purpose of enabling the unauthorized redistribution of others' intellectual property without consent. Upon information and belief, Millbrand has received substantial monetary proceeds in the form of crowdfunding and donations in order to support his illegal enterprise.

7. The Defendant, Meta Platforms, Inc., is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com. Meta Platforms has knowledge of and is aware of the "Are We Dating the Same Guy?" communities and the group's stated intent and rampant engagement in intellectual property violations, and has repeatedly refused to comply with demands from intellectual property holders to remove their intellectual property from the site.

8. The Defendant, Spill The Tea, Inc. is a corporation registered and authorized to do business in the State of Delaware and owns and operates the "Are We Dating the Same Guy?" communities. Spill The Tea, Inc. is an illegal enterprise with its stated intent and purpose to be enabling the unauthorized redistribution of others' intellectual property. Spill The Tea, Inc. maintains and operates the websites known as [www.spilltheteainc.com](http://www.spilltheteainc.com), [www.awdtsg.com](http://www.awdtsg.com), and [www.arewedatingthesame.com](http://www.arewedatingthesame.com). This Defendant receives compensation for enabling the unauthorized redistribution of intellectual property through subscription fees and crowdfunding.

9. Plaintiff is unaware of the true names and capacities of several prospective Defendants sued herein as Jane Doe, and therefore Plaintiff sues these Defendants by the above-referenced fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed and therefore alleges that each fictitiously

named Defendant is responsible in some manner for the occurrences alleged and Plaintiff's injuries as herein alleged were proximately caused by said Defendants.

### **JURISDICTION**

10. Jurisdiction is proper pursuant to 28 U.S.C. § 1332 in that all Plaintiffs and Defendants are domiciled within different States and the amount in controversy exceeds \$75,000.00.

### **VENUE**

11. Venue is proper under 28 U.S.C. § 1391(b)(2) in that all or a substantial part of the events or omissions giving rise to the claim occurred within this district.

### **FACTS**

#### **Are We Dating the Same Guy?**

12. "Are We Dating the Same Guy?" is a collection of social groups maintained on various social media platforms throughout the Internet by Defendants. Said platforms purport to provide an anonymous platform for women to, without authorization, republish intellectual property, discuss, and disparage men in their local communities with which they have allegedly had unsatisfactory dating experiences. The collection of online communities claims to have over 4,000,000 registered users. *See Exhibit A.*

13. "Are We Dating the Same Guy?" self-describes its community as "Red Flag Awareness groups all across the country where women can empower each other and keep each other safe from toxic men." The group pontificates to the world that they are doing the "[L]ord's work" by maintaining a platform to enable and permit women to anonymously republish

intellectual property of others without authorization, dox, defame, and attack the moral character of men they've met online. *See Exhibit A.*

14. The “Are We Dating the Same Guy?” network of social platforms is divided into a large number of subgroups reflecting major metropolitan areas across the globe for the purposes of organization. Each and every platform carrying the “Are We Dating the Same Guy?” branding on any social media platform is operated by the same or substantially similar groups of individuals to the Defendants listed herein.

15. Defendants Sanchez, Millbrand, Abbigail Rajala, Spill The Tea, Inc., and Jane Does have engaged in the creation, maintenance, publishing, and marketing, either as a user or administrative officer of a subgroup of “Are We Dating the Same Guy?” known as “Are We Dating the Same Guy? | Chicago” (The “Chicago Subgroup”) maintained on the social network Facebook. Said group contains approximately 100,000 members.

16. Defendants Sanchez, Millbrand, Spill The Tea, Meta Platforms, and Jane Does digitally monetize the “Are We Dating the Same Guy?” Platform through various avenues, including crowdfunding sources via Patreon, GoFundMe, and similar platforms, the collection of direct donations, and by displaying advertising and collecting consumer information related to users on the subject sites.

17. That the Chicago Subgroup publishes dozens of instances of copyright infringement or otherwise stolen intellectual property alongside statements and narratives daily from women who wish to provide personally identifiable information about a man in the community with which they allege to have had a dating relationship. Thousands of men have been potentially defamed, doxed, or had their intellectual property stolen by Defendants via these

online publications and remain entirely unaware of the attacks on their character and misappropriation of their likenesses as a result of the social media group's private status and heavily moderated members list.

18. No independent fact-checking of the statements made by any woman published in the community occurs. No verification that authorization exists for the republication of a man's intellectual property occurs. Women are permitted to make statements, publish photographs, defame, threaten, harass, belittle, or otherwise attack men whom they allege to have engaged in a dating relationship with, void of any oversight and with total impunity.

19. Each and every Defendant has actual knowledge of intellectual property violations occurring on their platform and has actively refused to take any action to prevent continued infringement. Defendants not only permit intellectual property violations to occur, but actively encourage said violations. Further, Defendants encourage the publication of men's personally identifiable information and potentially defamatory statements, inclusive of full names, photographs, employer information, addresses, and similar.

20. Defendants Sanchez and Spill The Tea frequently provide legal and editorial advice pertaining to the substance of posts in an effort to assist users in avoiding liability for their unlawful conduct. Group administrators will assist in the editing of language in particular posts in an effort to avoid civil or criminal liability for the dissemination of any particular statement or the republication of any particular piece of intellectual property, including providing extensive guidelines on how to circumvent Facebook's policies on preventing such conduct.

21. Upon information and belief, certain agents and employees of Meta are active members, moderators, and administrators of the "Are We Dating the Same Guy?" communities

and engage in the same or substantially similar conduct to that described in Paragraph 20 above.  
*See Exhibit G.*

22. Several “Are We Dating the Same Guy?” Facebook groups, along with the accounts of several prominent administrators, including Defendant Sanchez, were previously banned by Meta for violations of Facebook’s Community Guidelines in connection with the conduct described above.

23. That subsequent to the removal of the aforementioned groups and accounts on the platform, Meta was contacted by Defendants Sanchez and Spill The Tea and reviewed the functions and purpose of the groups during the reinstatement process.

24. Meta would have viewed the rampant intellectual property violations on the group pages, the group’s rules encouraging users to violate others’ intellectual property rights, and similar information during the reinstatement process.

25. Any reasonable person, when reviewing the encouragement by Defendants Sanchez, Millbrand, Spill The Tea, and Jane Does to publish intellectual property without authorization, would have understood and become aware that unauthorized redistribution of intellectual property is apparent within the communities.

26. Upon information and belief, Meta and its agents create, edit, modify, and develop particular pieces of content and software for the purpose of use by the Are We Dating the Same Guy communities, namely, without limitation, the enabling of “anonymous” posting and commenting within the groups and the enabling of software that permits group moderators and administrators to obtain information related to users who screenshot any particular post on the group pages. This conduct assists in propagating and encouraging the republication of others’

intellectual property without authorization, while Meta has actual knowledge of the rampant intellectual property violations apparent in the communities.

27. Meta has received thousands of individual notifications from men around the world that their intellectual property is being redistributed without authorization, and Meta has ignored these demands for takedown and, in the alternative, has sought to make legal determinations with respect to others' intellectual property rights in order to assist and enable the infringing conduct of the communities.

28. Meta continues to enrich itself by displaying advertising materials next to intellectual property which has been redistributed without authorization and collects consumer information and data from users which it chooses to display such content to.

29. Defendants Sanchez, Millbrand, Spill The Tea, and Jane Does have engaged in numerous crowdfunding events for the purpose of raising funds to develop a website, smartphone application, and other infrastructure to enable their illegal enterprise.

30. The purpose and intent of the "Are We Dating the Same Guy?" communities, its owners, administrators, moderators, and users, is to:

a. Publish the personally identifying information of men through names, photographs, and locations;

b. To publish private facts which are facially revealing and offensive pertaining to the personal lives of men, despite said facts being of no legitimate public concern for the purpose of commercial profit;



c. To republish the intellectual property of others without authorization for the purpose of commercial profit.

31. On or about April, 2023, Defendants Sanchez, Millbrand, and Spill The Tea published a fundraiser on the “GoFundMe” platform seeking to raise funds in the amount of \$50,000.00 for the development of a smartphone app to enable further unlawful conduct as described above. Said fundraiser has raised approximately \$55,000.00 to date.

32. Said fundraiser promises that all funds raised are “reinvested.”

33. Upon information and belief, Defendant Millbrand is a software developer by trade and has developed the relevant software for the smartphone application and websites maintained by Defendants Sanchez, Millbrand, and Spill the Tea.

34. Upon information and belief, Defendants Millbrand and Sanchez are engaged in a dating relationship.

35. Upon information and belief, no funds have been invested in the development of the smartphone application software, and Defendants Sanchez and Millbrand have retained said funds for their personal benefit.

36. Upon information and belief, despite Defendant Sanchez, Millbrand, and Spill the Tea’s statements to the contrary (“I really just used [the crowdfunding revenue to cover paying others...]”) dozens of moderators and administrators who were promised payment for their services remain unpaid, and Defendants Millbrand and Sanchez instead retained funds for their personal benefit.

37. That on January 14, 2023, Defendant Sanchez published an announcement to her fundraiser page stating that a beta version of the application had been published. Sanchez wrote that “The current beta version is testing screenshot blocking, screen record blocking, anonymous commenting, advanced tracking and logging to better help us catch bad actors.”

38. That the purpose of said features is to prevent victims from receiving notice that their intellectual property has been republished without authorization, that they are being defamed, harassed, doxed, and/or having private facts disclosed about them, in an effort to avoid liability.

39. Upon information and belief, Defendants Sanchez and Millbrand use the revenue generated from their unlawful conduct to finance their personal lives at the expense of the victims and intellectual property holders.

40. That on or about January 14, 2024, Defendant Sanchez published a fundraiser on the GoFundMe Platform seeking funds to finance their legal defense in the instant matter, which to date has raised nearly \$40,000.00.

41. That Defendant Sanchez maintains multiple accounts with “Venmo” an online payment processor and wallet service, known as @hownowpaopao and @awdtsgmoderators where she accepts funds for the express purpose of enriching themselves and allegedly distributing funds amongst the moderation team.

42. Upon information and belief, Defendants Sanchez and Millbrand retain funds from the subject Venmo accounts for personal benefit.

43. That on January 15, 2024, Defendant Sanchez published an announcement to the “Are We Dating the Same Guy?” community where she stated that users receive “hours and hours of benefits from this group...”

44. Defendant Sanchez’s choice of language is demonstrative of the true intent of the online community – to provide “hours and hours” of illegally reproduced intellectual property, defamatory statements, personally identifiable information, and private facts regarding the victims’ personal lives to its users at the expense of the victims and intellectual property holders.

### **Abbigail Rajala**

45. In 2023, Plaintiff and Defendant Abbigail Rajala met organically at a cultural event in Chicago, Illinois and briefly communicated with one another. Plaintiff and Defendant Abbigail Rajala engaged in consensual sexual intercourse on the evening they first met. The parties spent brief periods of time together on dates on a handful of occasions which were unremarkable. The parties never engaged in an exclusive dating relationship.

46. That in November 2023 Defendant Abbigail Rajala republished the intellectual property of the Plaintiff, a photograph of his likeness owned and controlled by Plaintiff, alongside provably false and defamatory statements pertaining to Plaintiff and disseminated same amongst members of the “Are We Dating the Same Guy? | Chicago” Facebook group, knowing said statements to be false and defamatory. Abbigail Rajala made these statements and republished the Plaintiff’s intellectual property to over 100,000 anonymous women with the intent of causing him reputational harm and putting him in reasonable fear of bodily harm to himself or his family at the hands of any of the 100,000 unidentified women involved in the

unlawful conduct apparent in the “Are We Dating the Same Guy?” communities. *See Exhibits B and C.*

47. Commenters on Rajala’s post requested personally identifiable information related to Plaintiff’s employer in an effort to make contact with and defame the character and reputation of Plaintiff for the purpose of causing harm to his employment status and/or attempting to cause his loss of gainful employment.

48. Upon information and belief, Defendants Rodney Rajala and Carol Rajala maintain a home internet network accessed and utilized by Defendant Abbigail Rajala for the purpose of posting such statements, intellectual property, and personally identifiable information relating to Plaintiff. Upon information and belief, Defendants Rodney Rajala and Carol Rajala were complicit in the unauthorized redistribution of Plaintiff’s intellectual property by permitting the unauthorized redistribution to occur on an internet network owned, maintained, and controlled by them.

**Jane Doe - Monica Tska**

49. Plaintiff has never met Defendant Jane Doe, sued herein under screen name Monica Tska, and the two have never interacted with one another.

50. In November 2023 in response to Abbigail Rajala’s post containing the unauthorized republication of Plaintiff’s intellectual property and his personally identifiable information, Monica Tska published a link to a CBS News Article detailing the arrest of one Anthony LaMonica, an Illinois resident who was charged with Criminal Sexual Assault. *See Exhibit C.*

51. Defendant Tska used said article and the mugshot of LaMonica to claim that Plaintiff and Anthony LaMonica were the same person, and that Plaintiff had been accused of criminal sexual assault.

52. Plaintiff is not Anthony LaMonica, has no relation to Anthony LaMonica, and has never committed, been charged with, nor convicted of criminal sexual assault.

53. Monica Tska made false statements of fact about Plaintiff's criminal history with the intent of causing harm to his reputation and standing in the community, with actual knowledge of the falsity of the statements and/or with reckless disregard for the truth.

**Plaintiff's Attempts to Remove Unauthorized Redistribution of His Intellectual Property  
and Defamatory Statements**

54. Plaintiff has never created or maintained an account on Facebook or any other platform maintained by Meta, has never agreed to any of Meta's terms of service, community guidelines, or similar, and has never authorized any Defendant to take any action with respect to his intellectual property and/or likeness.

55. That as part of the maintenance of the "Are We Dating the Same Guy?" Platform, Defendants Sanchez, Millbrand, Spill The Tea, Meta Platforms, and Jane Does engage in content moderation, which involves the review and approval of member applications, statements, and/or posts made on the platform.

56. That as a part of Defendants' content moderation responsibilities, Defendants would have reviewed the false and defamatory statements made about Plaintiff in addition to the unauthorized redistribution of his intellectual property and approved same for publishing.

57. On or about December 15, 2023, Defendants were contacted by Plaintiff and his attorneys demanding the removal of said intellectual property and false and defamatory statements.

58. Immediately following Plaintiff's contact of Defendants, Defendant Abbigail Rajala removed her post on the platform containing the intellectual property of Plaintiff and false and defamatory statements pertaining to Plaintiff, and republished same under an "anonymous" handle on the "Are We Dating the Same Guy? | Chicago" Facebook group in an effort to avoid the detection of her identity while continuing to engage in her unlawful conduct. *See Exhibit C.*

59. The Chicago subgroup, along with all other subgroups of the "Are We Dating the Same Guy?" community is maintained as an "invite-only" group on the Facebook platform intentionally and for the sole purpose of preventing victims of the Defendants' intellectual property violations and subjects of the Defendants' defamatory vitriol from becoming aware of the existence of same.

60. As of July 19, 2024, Defendant Abbigail Rajala's "anonymous" post remains in the Chicago subgroup and continues to republish and retransmit Plaintiff's intellectual property to users without authorization, despite all Defendants having due Notice of said unlawful conduct by way of the instant matter.

61. Upon information and belief, Meta Platforms utilizes sophisticated artificial intelligence software to generate algorithms which recommends content to users.

62. Upon information and belief, Meta's targeted recommendation algorithms chose to display the intellectual property of Plaintiff alongside defamatory statements pertaining to Plaintiff to users by elevating Plaintiff's post to the top of users' content feeds.

63. Upon information and belief, Meta took particular action to misappropriate Plaintiff's likeness and promote defamatory statements about Plaintiff by way of its recommendation algorithms.

64. Defendant Meta Platforms willfully and intentionally displayed and continue to display advertising materials for the purpose of commercial profit on pages redistributing without authorization the intellectual property of Plaintiff, misappropriating Plaintiff's likeness, and/or transmitting false and defamatory statements or personally identifiable information pertaining to the Plaintiff.

65. Defendant Meta Platforms willfully and intentionally continues to collect consumer information from users for the purpose of commercial profit on pages redistributing without authorization the intellectual property of Plaintiff, misappropriating Plaintiff's likeness, and/or transmitting false and defamatory statements or personally identifiable information pertaining to the Plaintiff.

**COUNT ONE – MISAPPROPRIATION (765 ILCS 1075)**  
**Against All Defendants**

66. Plaintiff reincorporates and realleges each preceding paragraph as if specifically set forth herein.

67. The Defendants, as part of an ongoing campaign of harassment and abuse, and for the Defendants' own financial gain, intentionally republished the Plaintiff's intellectual property, consisting of a photograph owned and controlled by him and containing his personal identity and likeness, without authorization.

68. The Defendants published Plaintiff's identity for a commercial purpose, including the crowdsourcing of funds and collection of monetary proceeds from supporters of the "Are We Dating the Same Guy?" community. *See Exhibits A and D.*

69. The Defendants did not seek to obtain permission from the Plaintiff before publishing and profiting from his identity and likeness.

70. The Defendants have never had authorization from Plaintiff to publish his intellectual property or likeness for any purpose, whether commercial or otherwise. To the contrary, Defendants have been explicitly and repeatedly notified that they do not have authorization to republish Plaintiff's intellectual property, but continue to do so for financial gain.

71. Defendant Meta continues to retransmit and republish Plaintiff's intellectual property and likeness without authorization for the purpose of commercial profit despite constructive and actual notice that they are engaging in unlawful conduct.

72. As a direct and proximate cause of Defendants' conduct, Plaintiff has suffered and will continue to suffer significant general, actual, consequential, and special damages including, without limitation, impairment of reputation and standing in the community, personal humiliation, mental anguish and suffering, emotional distress, stress, anxiety, lost earnings, and other pecuniary loss. These harms are ongoing and, if Defendants are not prevented from continuing to republish Plaintiff's intellectual property and likeness without authorization, those harms will continue.

**COUNT TWO – UNJUST ENRICHMENT**  
**Against All Defendants**



73. Plaintiff reincorporates and realleges each preceding paragraph as if specifically set forth herein.

74. Defendants unjustly received benefits in the form of payments from supporters, crowdfunding proceeds, advertising revenue, and the collection of consumer data at Plaintiff's expense through their wrongful conduct. Defendants continue to unjustly retain these benefits at Plaintiff's expense. It would be unjust for Defendants to retain any value they obtained as a result of their wrongful conduct.

75. Plaintiff is entitled to full restitution of all amounts by which Defendants have been unjustly enriched at Plaintiff's expense.

**COUNT THREE - DEFAMATION *PER SE***

**Against Abbigail Rajala, Paola Sanchez, Blake Millbrand, Spill the Tea, Inc., Jane Does**

76. Plaintiff reincorporates and realleges each preceding paragraph as if specifically set forth herein.

77. Defendants are "information content providers" within the meaning of 47 U.S.C. 230 and continue to publish, intend to continue to publish, and cause to be published a series of repetitive false and defamatory statements of fact about Plaintiff in a manner that led and will continue to lead to the reasonably foreseeable publication and republication of those and similar statements.

78. The defamatory meanings of Defendants' false statements and implied statements of fact are apparent from the face of the publication, refer to Plaintiff by name, are accompanied by Plaintiff's intellectual property consisting of an image of his likeness, and/or are understood to be written by Plaintiff.

79. The statements authored, published, and caused to be published by Defendants about Plaintiff are reasonably understood to state or imply that Plaintiff is dishonest, immoral and/or untrustworthy.

80. The statements authored, published, and caused to be published by Defendants about Plaintiff are reasonably understood to state or imply that Plaintiff has engaged in criminal activity by way of falsely accusing him of criminal sexual assault.

81. Each of the statements and the implications stemming therefrom are false and defamatory *per se* in that said statements have damaged Plaintiff in his trade, office, or profession and in that they falsely accuse Plaintiff of engaging in criminal activity.

82. Each of the statements published by Defendants are publicly available and was or will be viewed by thousands of individuals.

83. Plaintiff is a private figure, but in any event each of these false statements were published with actual malice, *i.e.*, with knowledge of its falsity or with reckless disregard to the truth. At a minimum, Defendants acted negligently in assessing or investigating the truth of the statements prior to publication. Defendants had no applicable privilege or legal authorization to make these false and defamatory statements.

84. Defendants acted with willful misconduct, malice, fraud, wantonness, oppression, and/or entire want of care which would raise the presumption of conscious indifference to consequences, and Defendants specifically intended to cause Plaintiff harm.

85. Defendants' statements have damaged and continue to damage Plaintiff's reputation in the general public, in their professions, in their church communities, in their neighborhood, and with friends, relatives, and neighbors.

86. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered and will continue to suffer significant general, actual, consequential, and special damages including, without limitation, impairment of reputation and standing in the community, personal humiliation, mental anguish and suffering, emotional distress, stress, anxiety, lost earnings, and other pecuniary loss. These harms are ongoing and, if Defendants are not prevented from continuing to repeat their defamatory statements about Plaintiff, those harms will continue.

**COUNT FOUR – CIVIL LIABILITY FOR DOXING (740 ILCS 195/15)**  
**Against Abbigail Rajala, Paola Sanchez, Blake Millbrand, Spill The Tea, Inc., Jane Does**

87. Plaintiff restates and realleges each preceding paragraph as if specifically set forth herein.

88. The Defendants, as part of a campaign of harassment and abuse, published the personally identifiable information of Plaintiff without his consent, namely his name and likeness to an online group dedicated to the harassment and belittlement of men with over 100,000 registered members.

89. That the Defendants published said information with knowledge and/or reckless disregard to the fact that the publishing of defamatory statements accusing someone of horrific crimes such as criminal sexual assault alongside personally identifiable information to an online platform of over 100,000 individuals would cause Plaintiff to be reasonably likely or otherwise have reasonable fear that he is likely to suffer significant injury, including risk of death, bodily injury, or stalking.

90. That as a direct and proximate cause of the Defendants actions, Plaintiff has suffered damages by way of significant emotional distress, disruption to his life, and fear of serious bodily injury at the hands of one of the group's thousands of unidentified members.

**COUNT FIVE – INVASION OF PRIVACY BY FALSE LIGHT; CIVIL CONSPIRACY**  
**Against Abbigail Rajala, Paola Sanchez, Blake Millbrand, Spill The Tea, Inc., Jane Does**

91. Plaintiff restates and realleges each preceding paragraph as if specifically set forth herein.

92. The Defendants, as part of a campaign of harassment and abuse, broadcast numerous outrageous lies about Plaintiff that represented such major misrepresentations of Plaintiff's character, history, activities or beliefs that serious offense may reasonably be expected to be taken by a reasonable person in Plaintiff's position.

93. The false light in which the Defendant's statements placed the Plaintiff's would be highly offensive to a reasonable person.

94. The Defendants had knowledge that their statements were lies, or acted with reckless disregard as to their falsity of their statements and the false light in which the Plaintiff's would be placed.

95. These false publications have caused Plaintiff actual and substantial damages.

96. In light of their prior experience with similar sorts of reckless and false statements, the Defendants knew that their publications could cause the Plaintiff to suffer harassment and potential violence.

97. The Plaintiff is a private individual and is neither a public official nor public figure.

98. The defendants broadcast their outrageous, cruel, and malicious lies about the Plaintiff with knowledge that the statements were false or with reckless disregard as to whether or not they were true.

99. The Defendants combined to conduct their campaign of harassment and abuse, which included numerous unlawful acts or lawful acts by unlawful means.

100. The Defendants combined to perform these unlawful acts pursuant to their scheme to harass and abuse the Plaintiff and in furtherance of that scheme.

101. As a result of the Defendants' wrongful conduct, Plaintiff has suffered damages.

**PRAYER FOR RELIEF**

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court award Plaintiff:

- a. Injunctive relief enjoining Defendants from making or publishing, or causing to be made or published, any further statements repeating any and all false claims that Plaintiff engaged in any sort of immoral or illegal conduct of any kind;
- b. Compensatory damages, where appropriate;
- c. Punitive damages, where appropriate;
- d. Restitution, where appropriate;
- e. The costs of this action, including attorney's fees; and
- f. Any such other and further relief this Court deems equitable and just.

**PLAINTIFF DEMANDS A TRIAL BY JURY.**

Respectfully submitted,

*Marc P. Trent*

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Marc P. Trent (ARDC # 6324928)  
Attorney for Plaintiff

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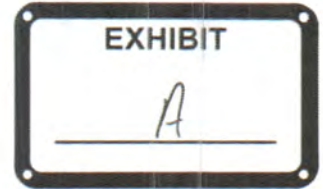
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## Create A Safe Platform For AWDTS

\$44,543 raised of \$50,000 goal • 1.7K donations

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Anonymous  
\$20 • 8 d



Anonymous  
\$20 • 9 d



Ishita Gupta  
\$25 • 25 d



Mackenzie Miles  
\$10 • 26 d



Tiffany Ranney  
\$20 • 26 d

See all

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Paola Sanchez is organizing this fundraiser.

1

I'm Paola Sanchez and I created and operate "AWDTSG" Red Flag Awareness groups all around the world where women can empower each other and keep each other safe from dangerous and/or toxic men.

I first started these groups to help solve some of the problems and dangers that me and my friends were experiencing with dating. We hit on a winning formula, and have grown by over 3.4 million members in just a year and a half, with over 600 moderators helping to run the groups. So we've stumbled onto something a lot of women are struggling with and are definitely onto something here... but this hasn't come without some struggles.

You may have noticed weird things going on with the groups these last few days. What happened was that 5 of our admin's accounts were abruptly deactivated all at once, including my 15 year old personal account. We've also had 4 of our groups suddenly shut down this week.. and none of those groups ever had community guideline violations.

With over 3,444,900 women in 212 groups we operate across the world, the sudden deactivation of all our admins has greatly disrupted our ability to keep them all safe. The worst part is the anxiety that comes with never knowing when or why our volunteers will suddenly be deactivated or a group will suddenly disappear.

These latest fiascos made me realize we need something better, and finally pushed me to start prioritizing my time towards building a new ideal platform for the lord's work we are doing here.. one with additional safety features such as screenshot logging, anonymous commenting, and much more.

I believe that the best way to keep women even safer is to create a platform where we can do everything we're doing in the groups, but with more specialized safety features and control over sharing.

But I realize that we need more resources to bring it into existence while continuing to operate and grow the current groups. I've started this GoFundMe to help raise as much of the development and operational costs as we can

I humbly ask you to please consider donating to support us in our efforts to help keep even more women safe

I guarantee that 100% of all money raised from this will go towards the design and development of an app or any necessary help in running the groups. I absolutely promise that 0% will go in my own pocket ❤️

I sincerely appreciate all of the support you've continued to give us! You ladies seriously mean the world to me! With your help we have a real opportunity to help dating get better for women everywhere

- Paola ❤️

P.S. To receive updates on development, please follow me on Instagram @hownowpaopao (<https://www.instagram.com/hownowpaopao/>) or enter your email on this simple web form I set up (<https://www.awdtsg.com/>). My instagram will be the main account to check for updates on the off chance more groups get deleted, so follow it for a place to regroup if you want to stay connected

P.P.S. If anyone has any friends or family at Facebook that they could put me in touch with to better understand things, please reach out to Dianne and let her know

P.P.P.S. We have looked into other existing platforms such as Discord and Reddit. It would be significantly more time consuming to determine that every member joining the group was for sure a real woman, and don't have the robust feature set we would want. It also still doesn't let us fine tune features to fit our specific safety concerns

2



P.P.P.P.S. I'm sorry that this isn't as detailed as I would have liked it to be, the deactivations all came so suddenly and I wasn't really planning on doing anything like this anytime soon.

P.P.P.P.S. Since first writing this, we have lost 6 groups totaling 251,800 members due to some overly restrictive FB moderation. I'm still fighting to try to get them back! But on a good note, within the last month alone their replacements have already reached 62,500 members but this further reinforces the fact that we need another platform.

EDIT! Here's some more information I was able to write out to address common questions:

I was hoping to announce this when it was further along and when I had written out something more informative that gave away more without giving too much, but this has pushed up the timeline in having to post it, as the group could potentially disappear at any moment without warning. I've been developing an app based off what I've learned in growing these groups. We've actually been able to find some great technical partners. It's not often that a concept gets validated and refined by a preexisting user base of millions of members, so that was very attractive in securing help.

If you're interested in giving a larger scale donation and having more details would be necessary for you to do so, please DM Dianne with the details around what you're thinking in terms of your investment, and in return I can happily provide you with more on the concept, as well as timetables, budgets, etc. It doesn't seem like a great idea to publicly release all of that information, as there's already competition in the market, and competing startups who may be able to use that information in their own plans. But I'm happy to share more in the right circumstances

I know this will take more than 50,000\$. Any dollar previously given was reinvested. Even if I said it was for a coffee, I really just used it to cover paying others, design and development costs, legal expenses and filings, etc. I also invested my own savings into this, and had a small family and friends round.

I have had offers from institutional investors, and will leverage them if need be. But I wanted to attempt this GoFundMe campaign as a way to not have to rely on investment capital so early, and be able to keep more of the company in the hands of women ❤️

💖 Add a Reaction to this GoFundMe

## Updates (1)

**April 28th, 2023** by Paola Sanchez, Organizer

Hey everyone! Some of you may have noticed already, but early last week I got my account back ❤️ It only took a letter to the CA Attorney General, tickets submitted by Meta employees who were in some of our groups, and over 2 weeks of stress to get it back

That being said, I'm still going to start putting more of my time towards developing our own app just in case shutdowns continue to happen!

Our current plan is to build it where it could function in a similar way to these groups should they ever get taken down, but also serve as an extension for these groups for as long as Facebook allows these groups to stay up essentially meaning that if you crosspost and link between the two, it provides a way to comment anonymously, prevent screenshots, and allow us better tracking on which users view content that later leaks. At least that's the current plan

3

Donate

Share



## Organizer



**Paola Sanchez**

Organizer  
Brooklyn, NY

Contact

## Words of support (33)

Please donate to share words of support.



**Kathy Rose**

\$100 • 7 mos

Thank you for all the meaningful work that you do to help keep women safe! ❤️



**Shamaly Valdez**

\$10 • 9 mos

Thank you for having the safe space to share and look out for one another



**Sara Ghattas**

\$50 • 9 mos

Thank you for all that you do. It is a thankless job. As a woman who organizes events as part of her side hustle, I wish I had folks understand how important you are to our safety. Protect women!



**Erin Cheever**

\$50 • 9 mos

The truth about the sickness in online dating culture must come out.



**Angela Teasenfitz**

\$20 • 9 mos

You're doing God's work. Thank you!!!



**Stella Guan**

\$20 • 10 mos

Thank you so much for your effort, Paola. Please reach out if you need any design help with the new platform.



**Nicole Eckert**

\$20 • 10 mos

4

1/8/24, 2:13 PM

Case: 1:24-cv-00200 Document #: 1 Filed: 01/08/24 Page 28 of 45 PageID #: 28

Although lost access when the big crash happened. You guys brought light to a situation and were a man wasted 5 years of my time. The women that commented shared and had also dealt with him were so supportive and we are all bonded. Doing the Lords... [Read more](#)



**MANDY VERNIER**

\$25 • 10 mos

Women supporting women to protect women. Thank you for developing a safe space for all of us trying to navigate the dating world. I'm sure your efforts have saved alot of women from pain and heartbreak.



**Sarah Horrigan**

\$25 • 10 mos

As a moderator... a separate platform would be life changing! Thank you for all you do Paola



**Kellie May**

\$20 • 10 mos



[Show more](#)

Created March 15th, 2023 • [Community](#)



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S

1/8/24, 2:13 PM

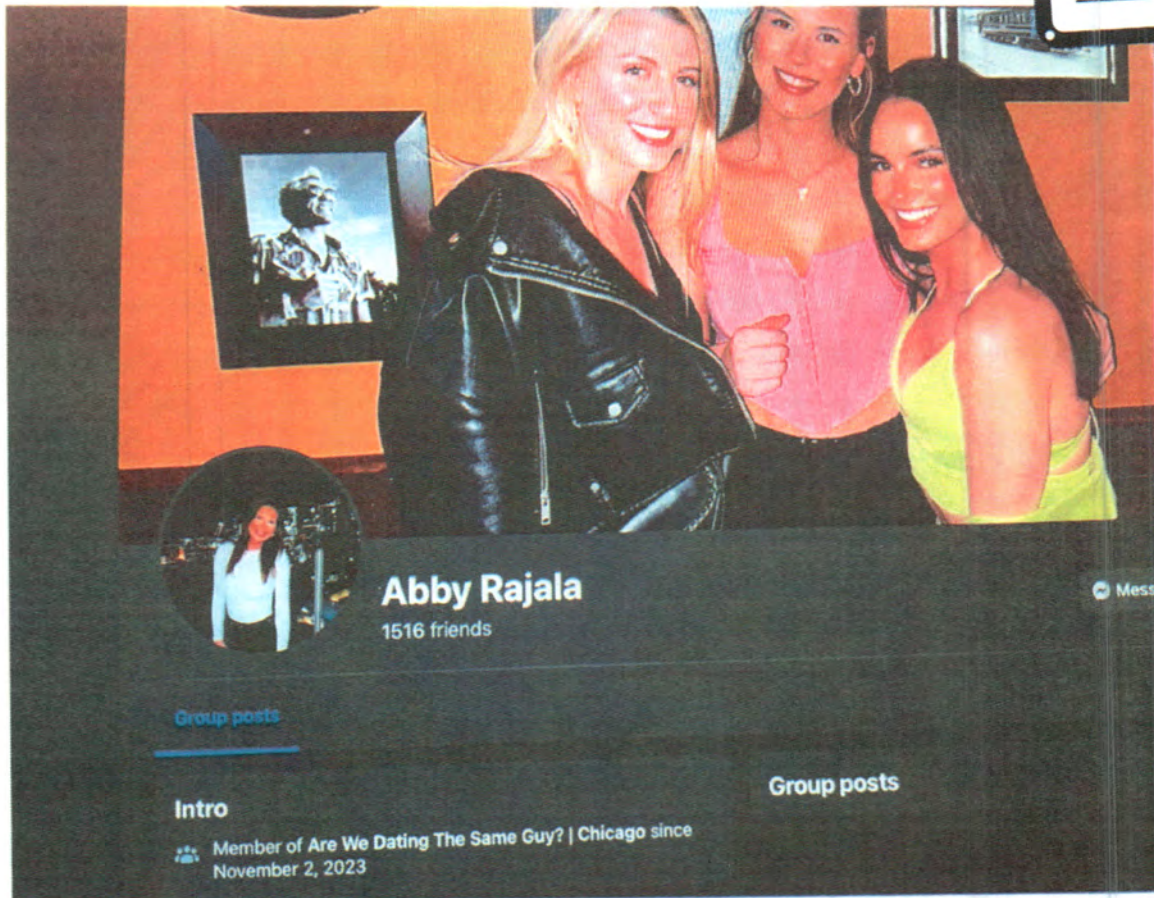
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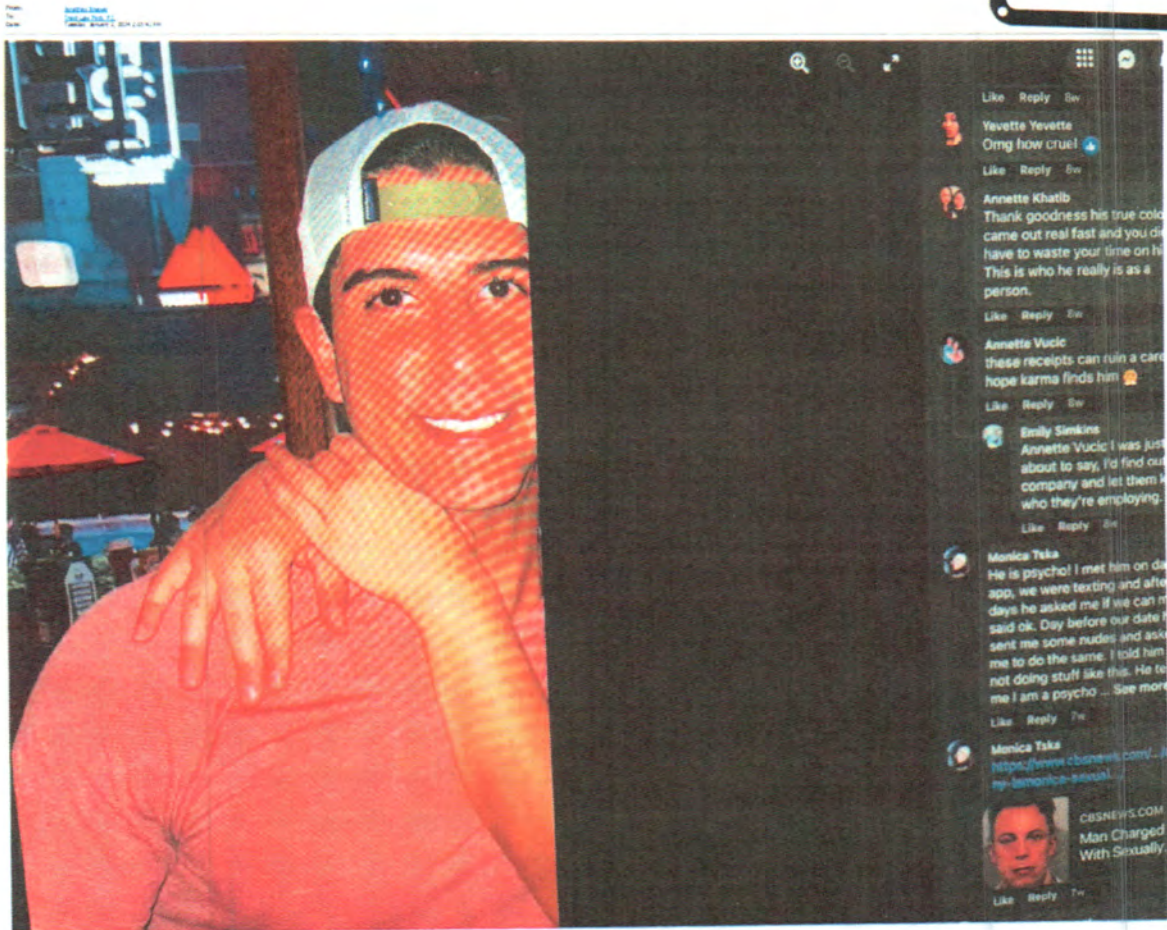
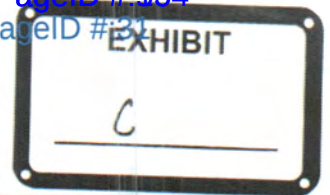
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6 of 6



EXHIBIT

B



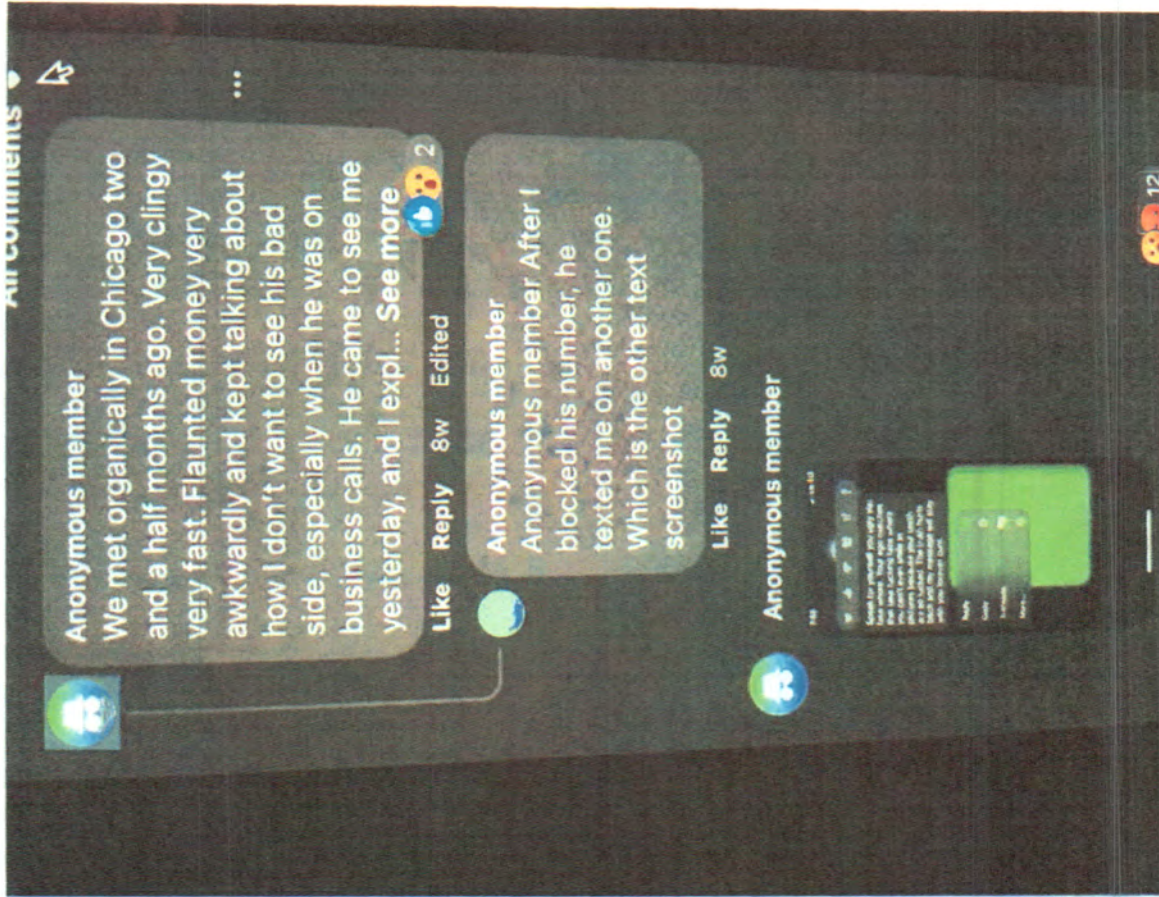


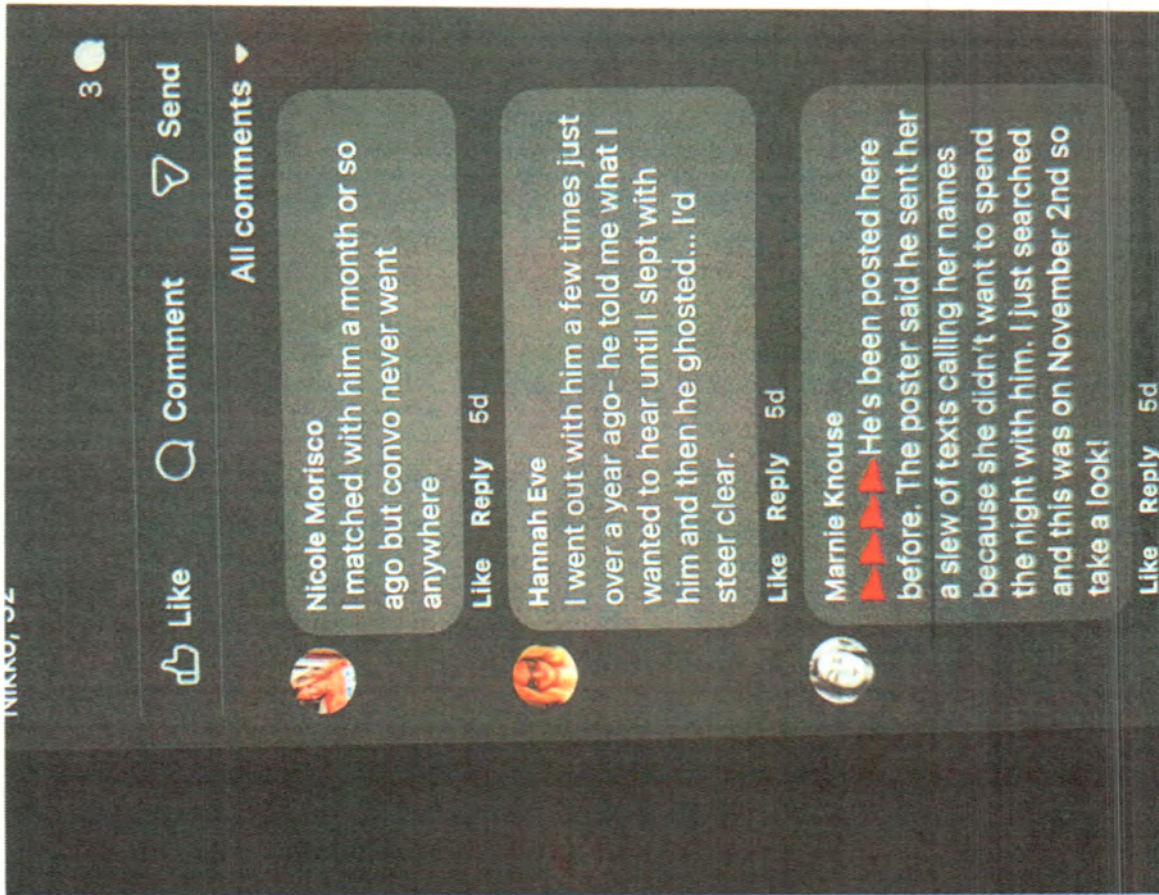
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101

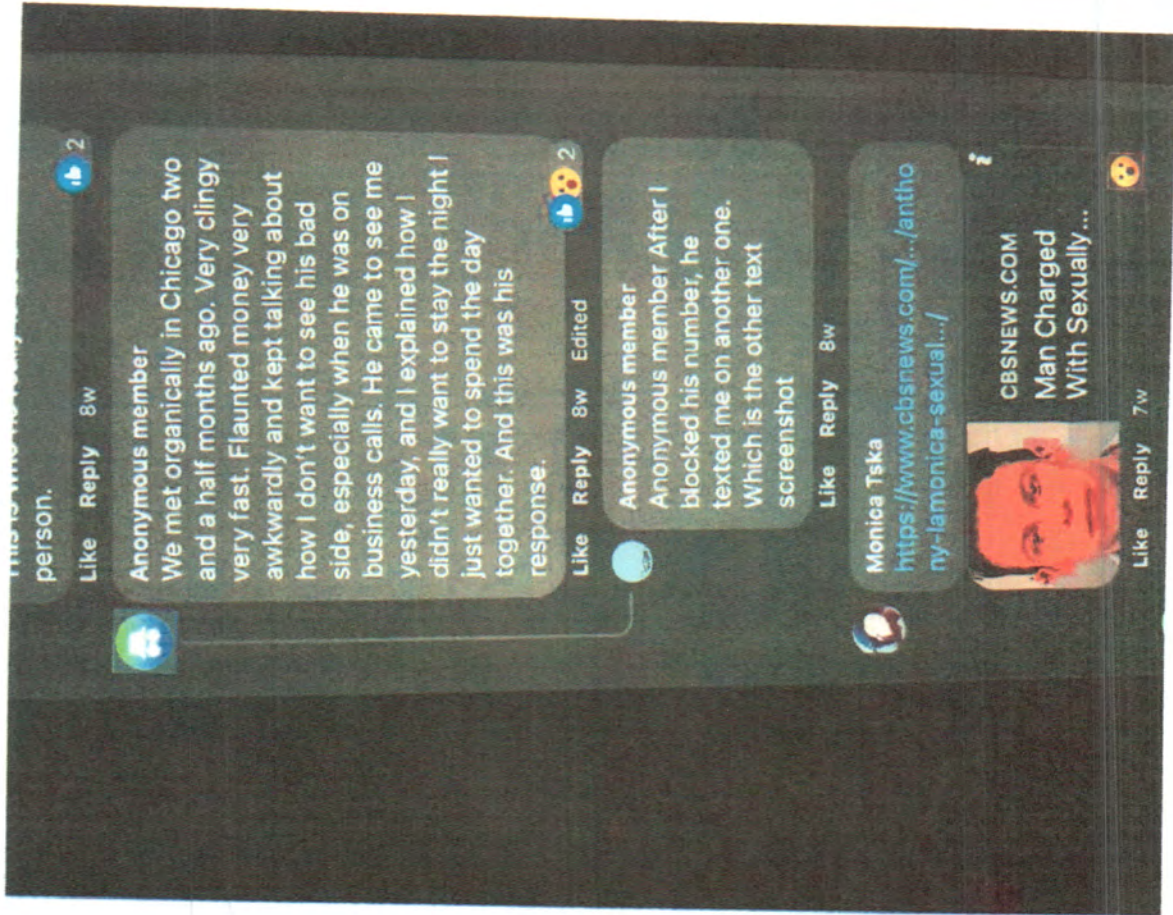
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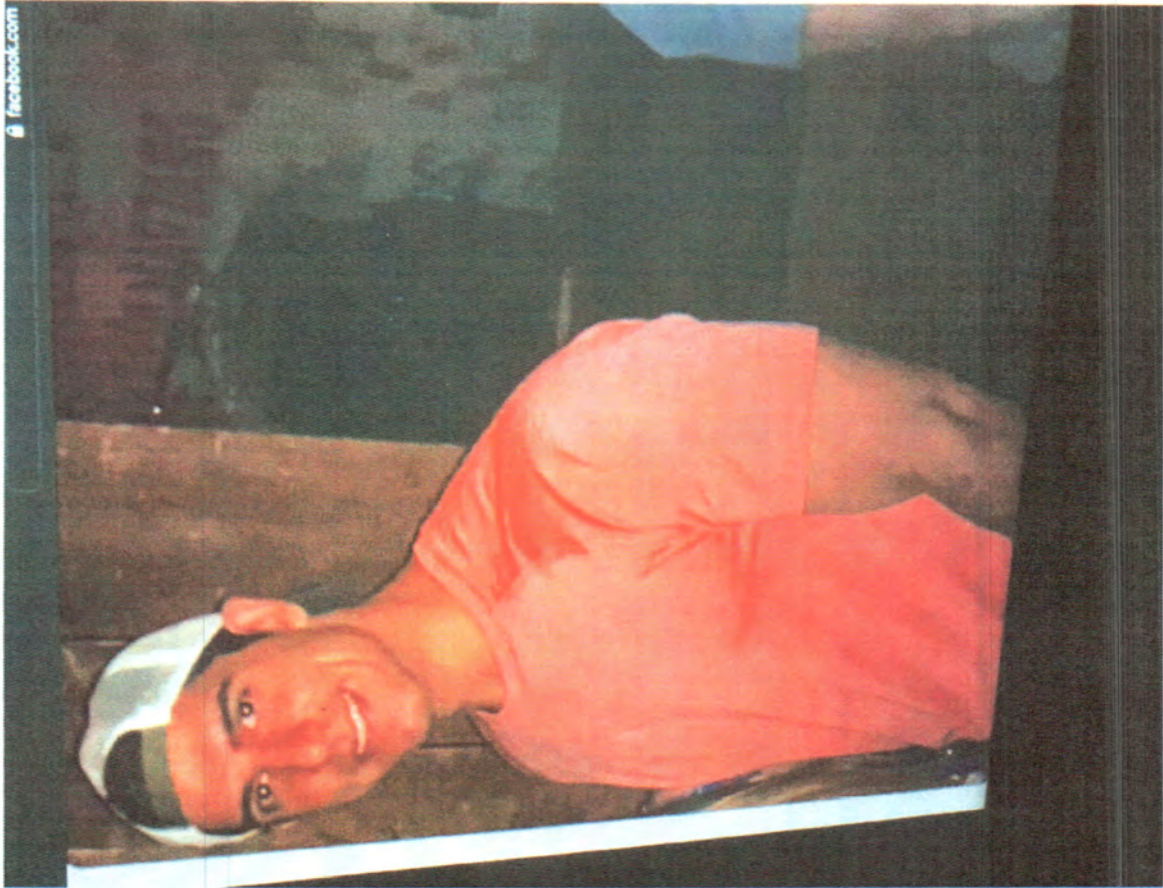






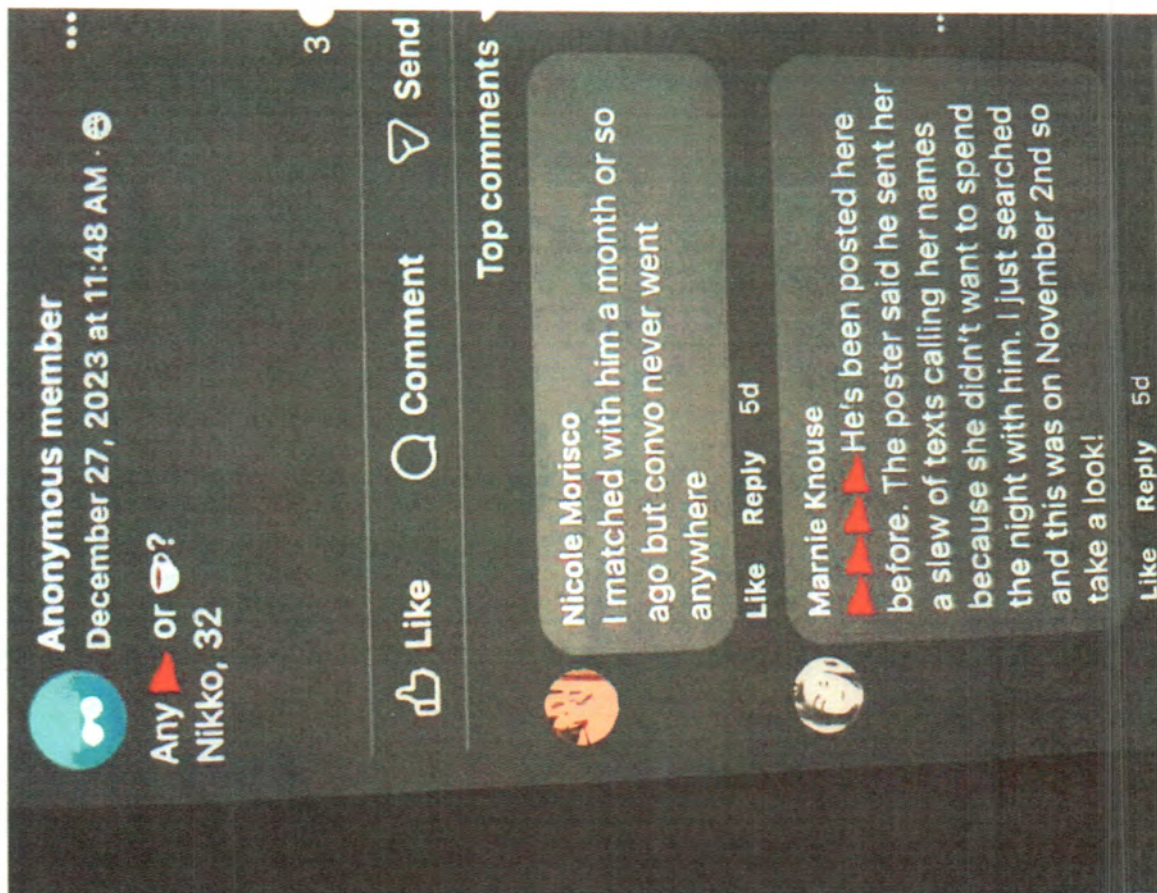




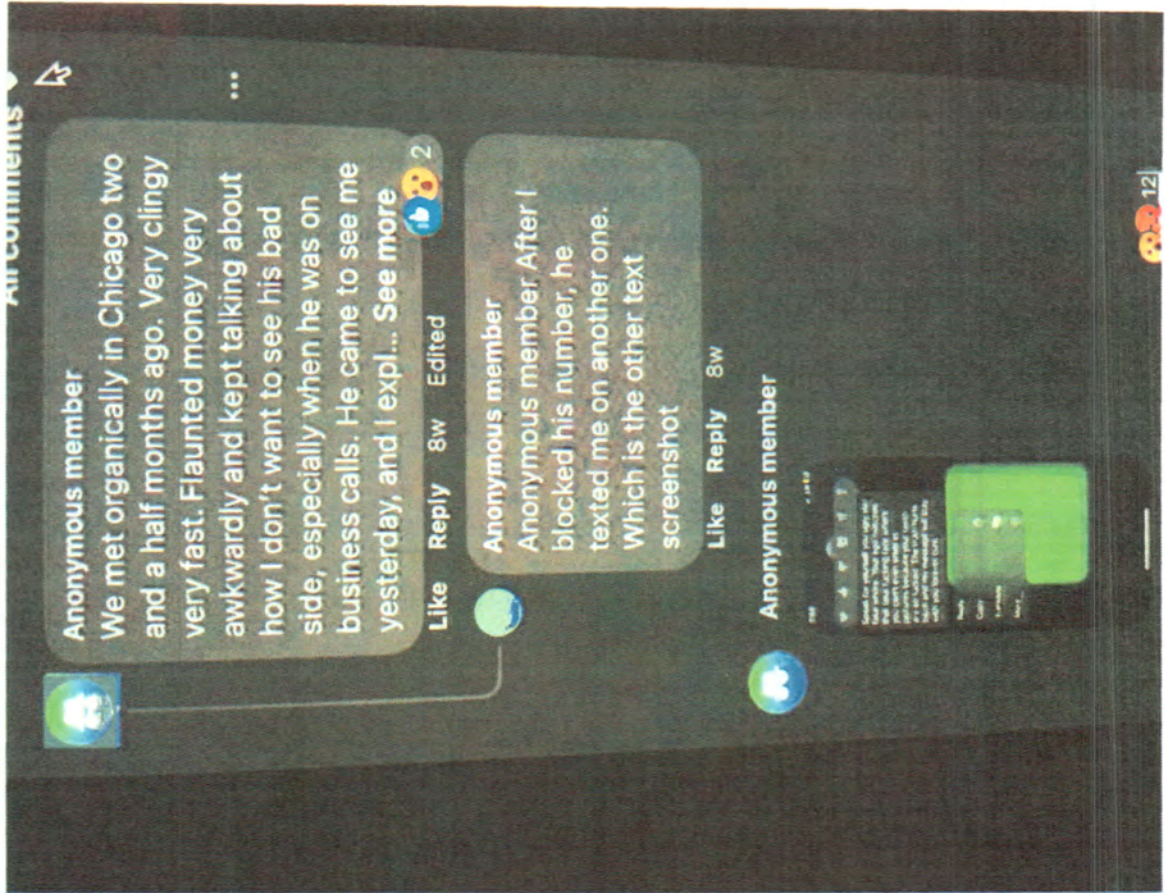


S





6



7c



Q Find a creator

Create on Patreon

Log in

Skip navigation



...

# Paola Sanchez

Creating safe & empowering communities for women to thrive in.

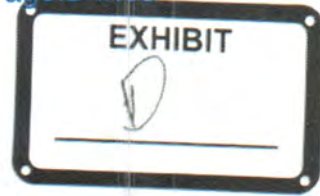
54 members • 158 posts • \$146.8/month

Join for free



Home

About



1-2





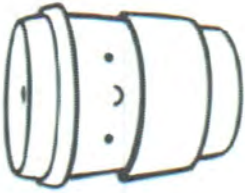
### Sip of SafeTea

\$5 / month

Skip navigation

This tier level is perfect for those who want to show a little more support and want to stay updated on the development and growth of safe spaces for women.

- General Support



### Cup of SafeTea

\$10 / month

Join

This is the tier level for those who want to show their support while also getting a behind the scenes look at the day to day operations of the current Red Flag Awareness groups as well as the development of our safetea dating app 📱 This tier includes: -beta app participation after one donation ever (once available) - interesting insights in running the groups as well as our development process -lists of worldwide group growth over time, mockups of apps and features, etc.

- Early access
- Behind-the-scenes content
- Work-in-progress updates (digital)



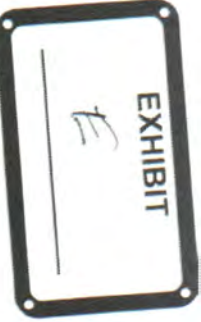
### Pot of SafeTea

\$25 / month

Join

This is the tier level for those who strongly believe in the cause and might be interested in having a direct influence on the decision making process and have input in the development of our safetea dating app as well as the direction of the current groups ❤️ p.s. omg I love you 🥰 This tier includes: -beta app participation after one donation ever (once available) - interesting insights in running the groups as well as our development process -lists of worldwide group growth over time, mockups of apps and features, etc. - exclusive polls when making tough decisions on names, direction, etc. -a private community where we can further

1/8/24, 11:34 A



5-1

(4) Are We Dating The Same Guy? | Chicago | Facebook



## Search Results

In Are We Dating The Same Guy? | Chicago

Nikko D'Ambrosio

### Filters

Posts You've Seen

Most Recent

Posted by

Tagged Location

Date Posted



Anonymous member

December 28, 2023 at 11:31 AM



Hii any tea on Nick? Seems sweet and thinking of meeting up. Just want to check for any red flags or anything before meeting in person since its my first time meeting someone from online. Thanks ladies 🙏

3 comments

Like

Comment

Send



Anonymous member

December 27, 2023 at 11:48 AM



Any or ?  
Nikko, 32

...

1/8/24, 11:34 AM



(4) Are We Dating The Same Guy? | Chicago | Facebook

## Search Results

in Are We Dating The Same Guy? | Chicago

### Filters

Posts You've Seen

Most Recent

Date Posted



3 comments

Like

Comment

Send



Anonymous member

December 3, 2023 · 🌐

...

Nick 📌📌📌 details/pics in comments once approved.



7

3 comments





## Search Results

in Are We Dating The Same Guy? | Chicago

Like

Comment

Send



Anonymous member

November 6, 2023 · 🌐

...

Any 🏳️ or 🚩 on Nick / Nicolas / Nicholas?

👍 2

1 comment

Like

Comment

Send



Anonymous member

November 2, 2023 · 🌐

...

Any 🏳️ on Nikko 32?

Date Posted



1/8/24, 11:34 AM



## Search Results

In Are We Dating The Same Guy? | Chicago

2:40



4

### Filters

Posts You've Seen

Most Recent

Date Posted



1/8/24, 11:34 AM



## Search Results

in Are We Dating The Same Guy? | Chicago

👤 1

3 comments



Like



Comment



Send

### Filters

Posts You've Seen

Most Recent

Date Posted





Are We Dating The Same Guy? | Chicago

EXHIBIT

F



Paola Sanchez

Moderator · October 21, 2022

We've been getting more reports of screenshots leaving the group and things getting back to some of the guys that were posted, so I'm dedicating a week of pinned posts to go over **the harm** this can cause, how to protect yourself, and what to do if it happens.

I can not emphasize enough how important it is for you to not screenshot or share anything you see in here.

You may be friends with a guy and think that the words posted about him can't possibly be true, but I'm telling you right now to please trust me when I say that some men act differently with women in the dating scene and that can include violent encounters and behavior that they don't exhibit in front of friends and colleagues. Letting your friend know he was shared here compromises the safety of every girl that spoke up.

You may have just found your boyfriend on here and feel the need to confront him about it. Don't let your emotions cloud your judgement. Take the time to think of another place where you heard the information and don't ever let him know that he was posted in any sort of group. That slip up could lead him back here to harass girls in an effort to destroy the evidence.

You may think you're just innocently sharing something funny, but then that person sends it to someone who knows someone and soon after the guy is coming after the girl who thought she could post safely here. Just put yourself in her shoes for one second and think about how scared she must feel.

We have a rigorous vetting process and have been working extremely hard to keep out any fake profiles and Trojan horses. And honestly I think we've gotten it down really good! Just to give you one example of the things we're dealing with: One man who was posted about in the group created two fake profiles (having stolen his profile pics from a girl on Instagram) in an attempt to get in. We caught and blocked both of them, at which point he messaged every moderator of the page threatening legal action in an attempt to get the post taken down.

We're working our absolute hardest to keep this group as safe as humanly possible, but it's all for nothing if girls are leaking info out of the group anyways.

So please, strongly consider **the harm** you might cause and don't screenshot or share anything outside of the group. We want to keep this as safe of a space as we possibly can.

And, as always, thank you from the bottom of my heart to the vast majority of you who are doing nothing wrong except existing in here and supporting each other 🙏🙏🙏

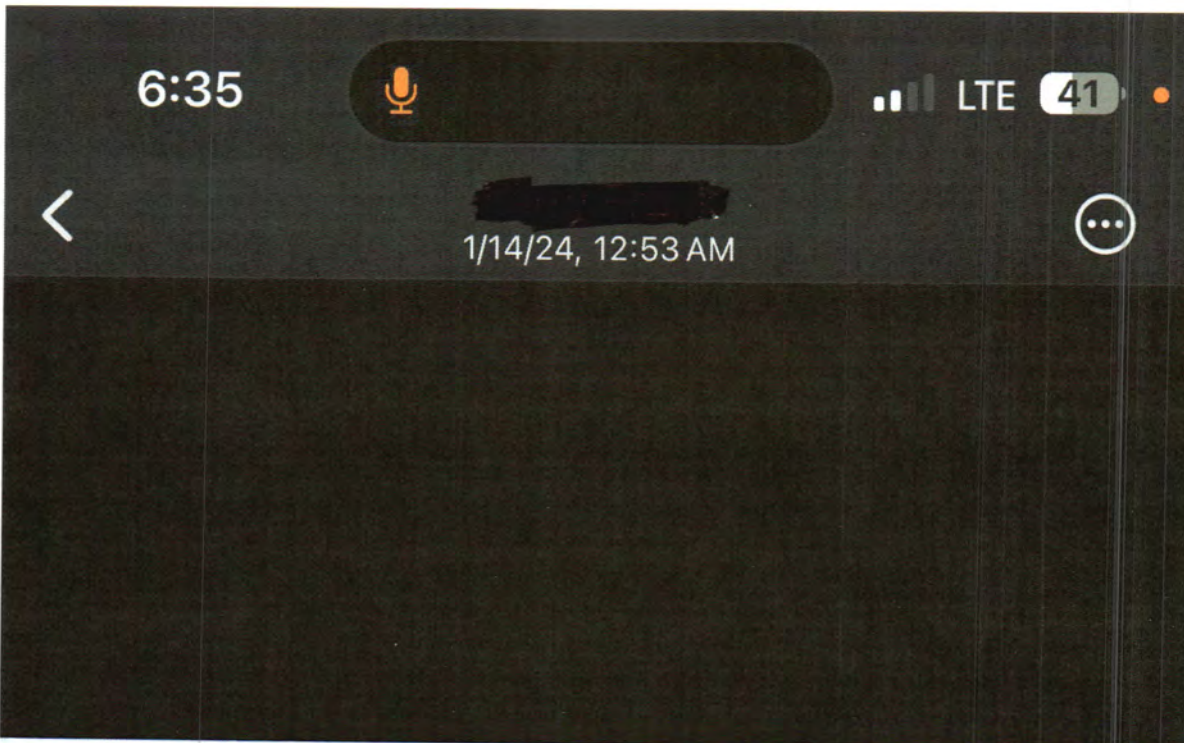


27 comments





From:  
To:  
Date:



**Paola Sanchez** ✓

Admin · April 6 · 🌐

...

Hey everyone! Some of you may have noticed already, but early last week I got my account back 🥰❤️ It only took a letter to the CA Attorney General, tickets submitted by Meta employees who were in some of our groups, and over 2 weeks of stress to get it back 😭😭

That being said, I'm still going to start putting more of my time towards developing our own app just in case shutdowns continue to happen! If you'd like to sign up to receive progress updates on the app, I set up a simple sign up page at <https://www.awdtsg.com> ❤️ the signup has optional fields for your name and city. If this page ever goes down, we'll use that email list to help regroup members 😊 if you want updates but don't check your email, I'll also be posting updates on my Instagram @hownowpaopao ❤️

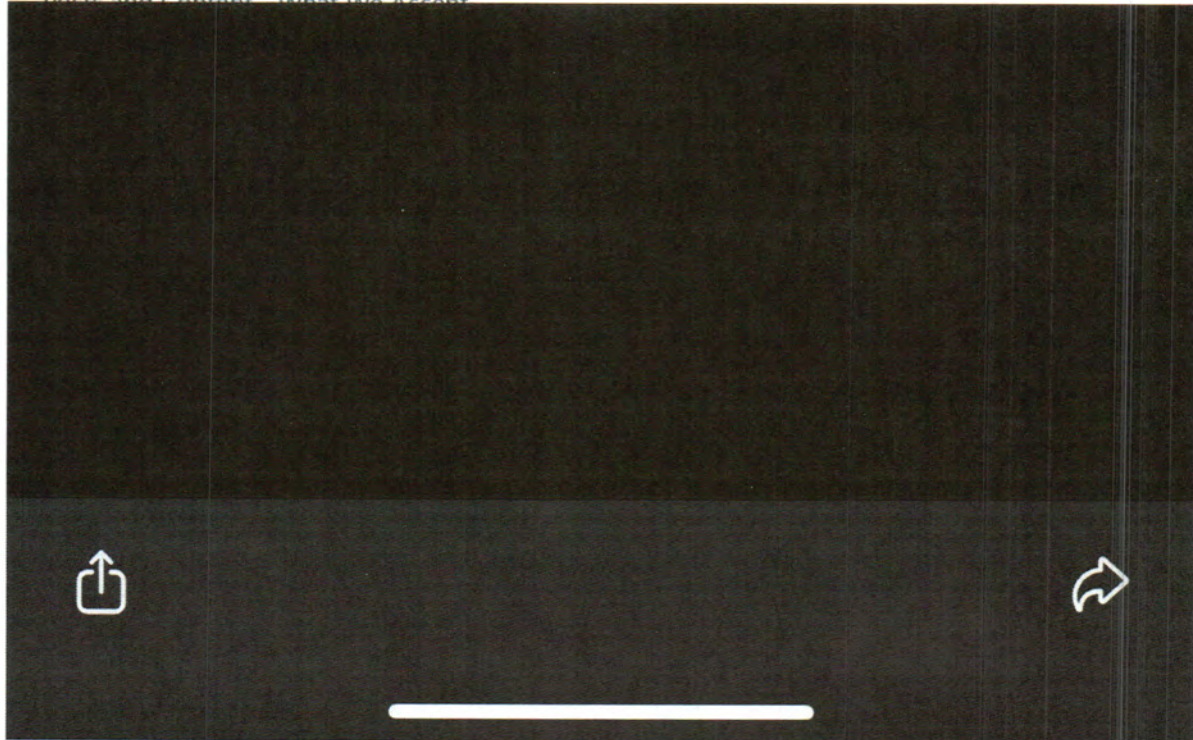
Our current plan is to build it where it could function in a similar way to these groups should they ever get taken down, but also serve as an extension for these groups for as long as Facebook allows these groups to stay up 😊 essentially meaning that if you crosspost and link between the two, it provides a way to comment anonymously, prevent screenshots, and allow us better tracking on which users view content that later leaks. At least that's the current plan 😊

The other thing I wanted to mention today is that, with it having been months since we last did the pinned posts here, starting on Monday we're going to repost all of them over the next month or two! In the spirit of me focusing more of my time on the app, some of the moderators who stepped up to keep things running while I was deactivated will be the ones running the series in most cities 😊

We wrote out a bunch of informational posts that will hopefully answer some of the most common questions and criticisms 😊 Some of the topics we'll be covering include:

Anonymous Posting Issues

Screenshots - Don't Do It  
Screenshots - Risk  
Screenshots - Be Prepared  
Screenshots - Confrontation  
Screenshots - What To Do  
Posts and Content - What We Ascent



Sent from my iPhone